

***LEEDS BROWN LAW, P.C.***

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May 23, 2013

*Via ECF and Facsimile*

Honorable A. Kathleen Tomlinson  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722-9014

Re: *Theresa Giacchetto v. Patchogue-Medford UFSD*  
Docket No.: 11-CV-6323 (ADS)(AKT)

Dear Judge Tomlinson:

We represent the Plaintiff regarding the above referenced matter. Accordingly, we submit this response to Defendant's application for an Order compelling Plaintiff's social worker and physician to appear for their depositions during the period of expert discovery. Notably, we do not represent the subpoenaed parties, Barbara Weitz and Dr. David Winkler.

The Plaintiff respectfully submits that we have no intention of moving the Court to quash Defendant's subpoenas. However, we request that the dates on which the depositions are conducted be mutually acceptable to both parties.

We thank this Court for its anticipated courtesy.

Respectfully submitted,

LEEDS BROWN LAW, P.C.

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/s/

Anne Edelman

cc: David Gold, Esq. (Via ECF)  
Steven Stern, Esq. (Via ECF)